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13 AMERICAN EXPRESS TRAVEL RELATED SERVICES
14 COMPANY, INC.
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STIPULATION

2 IT IS HEREBY STIPULATED by and between Defendant American Express
3 Travel Related Services Company, Inc. ("Defendant") and Plaintiff Sandra Verma ("Plaintiff"),
4 through their respective counsel (collectively the "Parties"), as follows:

5 1. As the Court may recall, on August 6, 2009, the Parties reached a resolution in
6 principle of this action. As a result, on August 7, 2009, the Court dismissed this action, with the
7 stipulation that Plaintiff had 60 days thereafter to inform the Court if the resolution was not
8 completed, in which case this litigation would be put back on the Court's calendar, including the
9 Parties' several pending motions.

10 2. The Parties have been diligently negotiating the terms of the resolution in principle.
11 The process was delayed for a short period of time by previously-scheduled vacations; however,
12 the Parties have now resolved all except for one outstanding issue, which one issue the Parties
13 expect to resolve by October 6, 2009. Thereafter, an agreement can be signed reflecting the
14 resolution in principle, and after a 7-day waiting period, the resolution in principle will be
15 completed.

16 3. The Plaintiff's return date to the Court to inform the Court that the matter has not
17 been resolved is October 6, 2009, but as noted above, the Parties need approximately three more
18 weeks to complete the resolution in principle. The Parties do not desire to be placed back on the
19 Court's trial calendar and believe that would be counter-productive, and instead only need a short
20 extension of time to complete the resolution in principle. As a result, the Parties respectfully
21 request the Court to extend the time period for Plaintiff to return to Court if the resolution in
22 principle for three additional weeks, to October 27, 2009.

23 || IT IS SO STIPULATED:

24 || Dated: October 5, 2009

PIERCE & SHEARER LLP

26 By: /S/ - Andrew F. Pierce

By: AS Andrew F. Pierce
Andrew F. Pierce
Attorneys for Plaintiff
SANDRA VERMA

1 || Dated: October 5, 2009

CARLTON DiSANTE & FREUDENBERGER LLP

By: /S/ - Connor J. Moyle

Connor J. Moyle

Attorneys for Defendant

AMERICAN EXPRESS TRAVEL RELATED SERVICES
COMPANY, INC.

8 PURSUANT TO THE ABOVE STIPULATION, AND GOOD CAUSE APPEARING, IT
9 IS ORDERED THAT PLAINTIFF SHALL HAVE UNTIL OCTOBER 27, 2009, TO INFORM
10 THE COURT THAT THE RESOLUTION IN PRINCIPLE HAS NOT BEEN COMPLETED.

Dated:

The Honorable Susan Illston
Judge, United States District Court